IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

TRUEPOSITION, INC.)
Plaintiff,)
v.) Case No. 2:11-cv-4574 (RK)
LM ERICSSON TELEPHONE COMPANY	7,)
QUALCOMM INC.,)
ALCATEL-LUCENT USA INC.,)
and)
THIRD GENERATION PARTNERSHIP PROJECT, a/k/a 3GPP)))
Defendants.))
	<u>ORDER</u>
AND NOW, on this day of	, 2014, upon consideration of
Plaintiff TruePosition, Inc.'s Motion for Lea	eve to File Under Seal Its Opposition to Defendant
Qualcomm's Motion to Compel Plaintiff Tru	uePosition to Answer Certain Interrogatories and
Declaration of David Golden with Exhibits i	n support, and good cause being shown, it is hereby
ORDERED and DECREED that Plaintiff's	Opposition to Defendant Qualcomm's Motion to
Compel Plaintiff TruePosition to Answer Ce	ertain Interrogatories and Declaration of David
Golden with Exhibits in support shall be file	d and maintained UNDER SEAL.
	BY THE COURT
	Hon. Robert F. Kelly, U.S.D.J.

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

TRUEPOSITION, INC. Plaintiff,))
v.) Case No. 2:11-cv-4574 (RK)
LM ERICSSON TELEPHONE COMPANY,))
QUALCOMM INC.,))
ALCATEL-LUCENT USA INC.,))
and)
THIRD GENERATION PARTNERSHIP PROJECT, a/k/a 3GPP))
Defendants.))

MOTION OF PLAINTIFF TRUEPOSITION, INC. FOR LEAVE TO FILE UNDER SEAL ITS OPPOSITION TO DEFENDANT QUALCOMM'S MOTION TO COMPEL PLAINTIFF TRUEPOSITION TO ANSWER CERTAIN INTERROGATORIES AND DECLARATION OF DAVID GOLDEN WITH EXHIBITS IN SUPPORT

Plaintiff TruePosition, Inc. hereby moves for leave to file under seal its Opposition to Defendant Qualcomm's Motion to Compel Plaintiff TruePosition to Answer Certain Interrogatories, and Declaration of David Golden with Exhibits in support. The Opposition and Declaration reference matters that have been designated "Confidential" and "Outside Counsel Eyes Only" pursuant to the Court's January 16, 2013 Protective Order. Therefore, in compliance with Paragraph 11 of the Protective Order, Plaintiff moves to file its Opposition and Declaration under seal.

Date: January 21, 2014 Respectfully submitted,

s/John G. Harkins, Jr.

John G. Harkins, Jr. (Atty. I.D. 4441) Colleen Healy Simpson (Atty. I.D. 84956) HARKINS CUNNINGHAM LLP 4000 Two Commerce Square 2001 Market Street Philadelphia, PA 19103-7044 (215) 851-6700

Douglas E. Rosenthal
Seth D. Greenstein
Aymeric Dumas-Eymard
David Golden
Nneka Ukpai
CONSTANTINE CANNON LLP
1301 K Street, NW, Suite 1050 East Tower
Washington, D.C. 20005
(202) 204-3500

Gordon Schnell
Alysia Solow
Jean Kim
Axel Bernabe
Joel A. Chernov
Taline Sahakian
CONSTANTINE CANNON LLP
335 Madison Avenue, 9th Floor
New York, N.Y. 10017
(212) 350-2700

Stuart Salen Shelby Haverson TRUEPOSITION, INC. 1000 Chesterbrook Blvd., Suite 200 Berwyn, PA 19312 (610) 680-1000

CERTIFICATE OF SERVICE

I, Evelyn R. Protano, hereby certify that on January 21, 2014 I caused a true and correct copy of the Motion for Leave to File Under Seal Its Opposition to Defendant Qualcomm's Motion to Compel Plaintiff TruePosition to Answer Certain Interrogatories and Declaration of David Golden with Exhibits in support, to be served upon the following by ECF:

Stephen W. Armstrong Montgomery, McCracken, Walker & Rhoads, LLP 123 South Broad Street Philadelphia, PA 19109 sarmstrong@mmwr.com

Steven E. Bizar Buchanan Ingersoll & Rooney PC Two Liberty Place 50 S. 16th Street, Ste. 3200 Philadelphia, PA 19102-2555 steven.bizar@bipc.com

Robert N. Feltoon Conrad O'Brien PC 1500 Market Street Centre Square West Tower, Ste. 3900 Philadelphia, PA 19102-2100 rfeltoon@conradobrien.com

Francis P. Newell
Peter Michael Ryan
Cozen O'Connor
1900 Market Street
Philadelphia, Pennsylvania 19103
fnewell@cozen.com
pryan@cozen.com

Kevin J. Arquit
Peri L. Zelig
Simpson Thacher & Bartlett LLP
425 Lexington Avenue
New York, NY 10017-3954
karquit@stblaw.com
pzelig@stblaw.com

Roger G. Brooks
Gary A. Bornstein
Yonatan Even
John D. Biancamano
Benjamin H. Diessel
Cravath, Swaine & Moore LLP
Worldwide Plaza
825 Eighth Avenue
New York, N.Y. 10019-7475
rbrooks@cravath.com
gbornstein@cravath.com
yevens@cravath.com
jbiancamano@cravath.com
bdiessel@cravath.com

Derek Care
Richard S. Taffet
Bingham McCutchen LLP
399 Park Avenue
New York, NY 10022-4689
derek.care@bingham.com
richard.taffet@bingham.com

William S.D. Cravens
Bingham McCutchen LLP
2020 K Street, N.W.
Washington, DC 20006-1806
william.cravens@bingham.com

Conor A. Reidy
Peter C. Thomas
Simpson Thacher & Bartlett LLP
1155 F Street, N.W.
Washington, DC 20004
CReidy@stblaw.com
pthomas@stblaw.com

Case 2:11-cv-04574-RK Document 254 Filed 01/21/14 Page 6 of 6

Ali M. Stoeppelwerth
Brian Boynton
Perry Lange
Wilmer Cutler Pickering Hale and Dorr LLP
1875 Pennsylvania Avenue, NW
Washington, DC 20006
ali.stoeppelwerth@wilmerhale.com
brian.boynton@wilmerhale.com
perry.lange@wilmerhale.com

s/ Evelyn R. Protano

Evelyn R. Protano